

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Joint Petition for Rulemaking to Resolve)	
Various Outstanding Issues Concerning the)	
Implementation of the Communications)	RM-10865
Assistance for Law Enforcement Act)	
)	
To: The Commission		

**JOINT REPLY COMMENTS OF
INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE
MAJOR CITIES CHIEFS ASSOCIATION
NATIONAL SHERIFFS' ASSOCIATION
MAJOR COUNTY SHERIFFS' ASSOCIATION**

The International Association of Chiefs of Police (IACP), the Major Cities Chiefs Association (MCC), the National Sheriffs' Association (NSA), and the Major County Sheriffs' Association (MCSA) (collectively "IACP-MCC-NSA-MCSA") hereby jointly submit the following reply comments in response to the Commission's request for comment in the above-captioned proceeding.

The IACP is an organization of more than 19,000 professionals responsible for administration of law enforcement agencies within the United States and throughout the world. The MCC is an organization of chief executive officers of the largest local law enforcement organizations in North America. MCC membership includes fifty-four

departments from the United States and seven departments in Canada. The National Sheriffs' Association is an organization of more than 21,000 members that are dedicated to supporting programs that enable sheriffs, their deputies, chiefs of police, and others in the field of criminal justice to perform their jobs in the best possible manner and to better serve the people of their cities/counties or jurisdictions. The Major County Sheriffs' Association (MCSA) is a professional organization comprised of elected sheriffs throughout the United States who represent areas with populations of at least 500,000 residents.

Collectively, these organizations include the key decision makers in the United States Law Enforcement Community.

The IACP-MCC-NSA-MCSA are in strong support of the issues raised in the Joint Petition for Rulemaking filed by the United States Department of Justice, Federal Bureau of Investigation, and Drug Enforcement Administration (DOJ-FBI-DEA) and in the request for comments we previously filed separate letters of support for the Joint Petition.

We have since reviewed the original comments that were filed with the Commission and we wish to go on record as continuing our strong support for the Joint Petition for Rulemaking.

The IACP-MCC-NSA-MCSA would like to emphasize that although State and Local law enforcement agencies often rely upon DOJ-FBI-DEA for technical assistance

in these matters, State and Local law enforcement agencies administer more authorized intercepts than the Federal agencies. In 2001, State and Local law enforcement intercepts outnumbered Federal intercepts by a 2:1 ratio. In reviewing the intercept authorizations between 1990-2002, only in 1996 did Federal intercepts equal those of State and Local law enforcement.

The IACP-MCC-NSA-MCSA also rely upon the DOJ-FBI-DEA to implement the Communications Assistance for Law Enforcement Act ("CALEA"). "CALEA's purpose is to help lawful electronic surveillance keep pace with changes in telecommunications technology as telecommunications services migrate to new technologies"¹ and, therefore, on behalf of all State and Local law enforcement agencies, supports the efforts of DOJ-FBI-DEA to obtain Commission clarification and resolution on the numerous outstanding issues set forth in the Joint Petition.

The IACP, MCC, NSA, and MCSA applaud the Commission for soliciting comment on this most urgent law enforcement matter.

We urge the Commission to respond favorably to the DOJ-FBI-DEA Joint Petition that requests that the Commission initiate an expedited rulemaking proceeding to resolve the numerous outstanding CALEA related issues and to issue a notice of proposed rulemaking with proposals to resolve the issues in the Joint Petition.

¹ Joint Petition of DOJ-FBI-DEA at Page 3, line 13

Respectfully submitted,

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